

**United States District Court
For the Northern of Illinois**

FILED
SEP 26 2023 *EW*
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**Matthew Schwartz
Petitioner-Defendant**

Vs.

Case no. 1:21-cr-00316

**United States of America
Respondent-Plaintiff**

**Motion for Leave to File Reply in Support
Of Motion for Compassionate Release**

Now comes the Defendant/Movant, Matthew Schwartz, Pro Se, (hereinafter, "Mr. Schwartz ") and for his motion for leave to file his reply in support of his motion for compassionate release, and, in support thereof, states as follows:

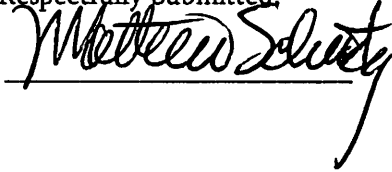
1. On or about August 25, 2023, this Honorable Court entered a minute order indicating, in part, that following the Government's response filing, no further party filings would be necessary regarding Mr. Schwartz' motion for compassionate release.
2. Mr. Schwartz respectfully requests that the Court reconsider this position and permit his filing of a reply herein based principally upon the fact that additional and very meaningful medical records have been secured which will provide the Court with a more detailed and compelling basis in its deliberations on the instant motion.

3. In that Mr. Schwartz principal motion for Compassionate release contention centers on the April 5, 2023 sentencing commission amendment involving a showing that an inmate's medical conditions and medical challenges would be materially better served of on home confinement, the additional medical record presentment at this time further strengthening this position is critically important.

4. Based upon the foregoing, Mr. Schwartz respectfully requests leave to EITHER be permitted to amend and supplement his previous motion filing, or to, instead, be permitted to file his reply herein to supply this additional and supporting information.

Wherefore, the Defendant/Movant, Matthew Schwartz prays that this Honorable Court enter and order in accordance with the foregoing request and for such other and further relief as this Court deems is just and proper.

Respectfully Submitted,

A handwritten signature in black ink that reads "Matthew Schwartz". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Matthew Schwartz

Pro Se Defendant / Movant

Reg. No 54469-424

FCI Milan

4004 East Arkona Road,

Milan, MI 48160

CERTIFICATE OF FILING

I, Matthew Schwartz, declares under penalty of perjury and under the federal mailbox rule that I filed this Motion for Leave to File Reply in Support Of Motion for Compassionate Release by placing a true and correct copy into the Institutional Mail, pre-paid USPS First Class, on SEPTEMBER 21 2023, addressed to:

Clerk of the Court

U.S. District, Court

Northern District of Illinois

219 South Dearborn St

Chicago, Illinois 60604

Matthew Schwartz

Pro Se Defendant / Movant

Reg. No. 54469-424

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CLERK OF THE COURT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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60604-160099

